

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGANKevin E. Bonham

(Enter above the full name of the plaintiff(s), including prisoner number, in this action. If you cannot list all plaintiffs in the space provided, please write "see attached" and list all names on an additional page.)

FILED - GR

October 1, 2024 10:47 AM
CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: KB SCANNED BY: dw / 10-1

v.

Family OUTREACH CENTER INC,
KENT COUNTY SHERIFFS OFFICE,
CORIZON HEALTH STRATEGIES,
VITAL CORE HEALTH STRATEGIES,
BRADLEY LYONS. et al.,

1:24-cv-1030

Jane M. Beckering - U.S. District Judge
Phillip J. Green - Magistrate Judge

(Enter above the full name of the defendant(s) in this action. If you cannot list all defendants in the space provided, please write "see attached" and list all names on an additional page.)

COMPLAINT
(Print Clearly)**I. Previous Lawsuits**

CAUTION: The Prison Litigation Reform Act has resulted in substantial changes in the ability of incarcerated individuals to initiate lawsuits in federal courts without prepayment of the civil action filing fee. Accurate and complete responses are required concerning your litigation history. Generally, a plaintiff's failure to accurately and completely answer the questions set forth below will result in denial of the privilege of proceeding *in forma pauperis* and require you to pay the entire \$405.00 filing fee regardless of whether your complaint is dismissed.

A. Have you ever filed a lawsuit while incarcerated or detained in any prison or jail facility? Yes ☒ No ☐

B. If your answer to question A was yes, for each lawsuit you have filed you must answer questions 1 through 5 below. Attach additional sheets as necessary to answer questions 1 through 5 below with regard to each lawsuit.

1. Identify the court in which the lawsuit was filed. If it was a state court, identify the county in which the suit was filed. If the lawsuit was filed in federal court, identify the district within which the lawsuit was filed.

UNITED STATES WESTERN DISTRICT

2. Is the action still pending? Yes ☐ No ☒

a. If your answer was no, state precisely how the action was resolved: I BELIEVE IT
RESOLVED IN DEFAULT JUDGEMENT

3. Did you appeal the decision? Yes ☐ No ☒

4. Is the appeal still pending? Yes ☐ No ☐

a. If not pending, what was the decision on appeal? _____

5. Was the previous lawsuit based upon the same or similar facts asserted in this lawsuit? Yes ☒ No ☐

a. If so, explain: JANET T. NEFF TOLD ME TO MAKE SEPERATE
ACTION TO INVOLVE WHOM I NEED TO AS DEFENDANTS

II. Parties

A. Plaintiff(s)

Enter your name, place of confinement, address, and place of confinement during the events described in the complaint in the blanks below. Provide the same information for any additional plaintiffs. Attach extra sheets as necessary.

Name of Plaintiff KEVIN E. BONHAM

Place of Present Confinement KENT COUNTY CORRECTIONAL FACILITY

Address 703 BALL AVE NE

Place of Confinement During Events Described in Complaint KCCF, MDOC

B. Defendant(s)

Complete the information requested below for each defendant in this action, including whether you are suing each defendant in an official and/or personal capacity. Provide the same information for each additional defendant. If there are more than six defendants attach extra sheets as necessary.

Name of Defendant #1 KENT COUNTY SHERIFFS OFFICE

Position or Title - N/A

Place of Employment SAME

Address 701 BALL AVE

Official and/or personal capacity? BOTH

Name of Defendant #2 KENT COUNTY SHERIFFS ASSN

Position or Title - N/A

Place of Employment SAME

Address 701 BALL AVE

Official and/or personal capacity? BOTH

Name of Defendant #3 FAMILY OUTREACH CENTER INC

Position or Title - N/A

Place of Employment -

Address _____

Official and/or personal capacity? BOTH

Name of Defendant #4 VITAL CORE HEALTH STRATEGIES

Position or Title MEDICAL

Place of Employment - N/A

Address - N/A

Official and/or personal capacity? BOTH

Name of Defendant #5 CORIZON HEALTH STRATEGIES

Position or Title MEDICAL

Place of Employment - N/A

Address _____

Official and/or personal capacity? BOTH

III. Statement of Claim

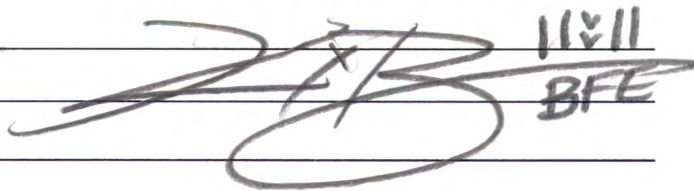
State here the **facts** of your case. Describe how each defendant is personally involved. Include also the names of other persons involved, dates and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. **Do not include unrelated claims.** Use as much space as you need. Attach extra sheets if necessary.

- THE FACTS: I was retaliated against for speaking up and speaking out against improper behavior of a deputy and was corporally punished for almost 30 months. Which led to being sexually assaulted for upwards of 5 whole months. Ignored completely by the Deputies of Kent County Sheriff's OFFICE, WHO failed to keep me safe. I will name the main SHERIFF STAFF whom I was told personally from a STAFF MEMBER WHO WAS SEXUALLY ASSAULTING ME &
- 1 SEVERAL OTHER STAFF members *BRADLEY LYONS was having me personally punished which constitutes as corporal
 - 2 punishment because of his rank at the jail. Deputy JOURDEN assisted in the punishment also harassing unprofessional behavior by asking me and another man (CORTEZ HOWARD)
 - 3 if we heard he got his dick sucked. Dep. DEWITT DENIED ME Food as retaliation for seeking help. THERESA SIMMONS SEXUALLY assaulted me for upwards of 5 months. Between
 - 4 July 23, 2021 to January 20, 2022, This is the most cruel and unusual punishment I've ever endured by people intentionally, I will be including an extra three pages of a statement of claim.

Respectfully

Kevin E. Bonham

Sorry that im being
winded. But everything I have
properly grieved to no avail.
Everything is on camera
also.

 11/11
BFE

STATEMENT of CLAIM

DEFENDANTS: Family Outreach Center Inc, ^{Capt.} Bradley LYONS, Kent County Sheriffs Office, KENT COUNTY SHERIFFS ASSN, CORIZON HEALTH STRATEGIES, VITAL CORE HEALTH strategies, THERESA SIMMONS, SGT. SANTIAGO, DEP. GRANT DEWITT, DEP. JOURDAN, Michelle HajoY YOUNG, ~~Roger Bury~~,

Were all acting under color of state law when they intentionally, dilliberately, knowingly, violated my 1st, 5th, 8th, also 14th Amend ment constitutional rights willfully and distastefully by subjecting me to corporal punishment, exhausting and extreme harmful mental abuse, excessive sexual abuse, ignoring my cries for help, mental anguish, physical abuse, forcing me to attempt suicide (several times) because of how sad i was/still am, hurt feelings, bullying, ect. I still have PTSD & Night terrors, The voices i hear are louder.

It all started on or exactly about July. 23, 2021 when i was denied a dinner tray by a deputy named Grant DEWITT because he (DEWITT) was retaliating on me for getting help because me and another inmate (my BunkY) CORTEZ HOWARD heard rumors from other inmates that a deputy of an area of the jail -D3 named JOURDEN was having sexual encounters with some of the male inmates. one day he stopped at our door and asked "Did we hear if he got his dick sucked" we (HOWARD & I) became

very afraid and informed mental health staff
 CHEYENNE. There was a pre investigation that
 im pretty sure started the land slide of bullying,
 and corporal punishment that i endured, also this
 following incident. (Everything in this complaints is on camera)
 Shortly after these incidents (at the time)
 Lt. Bradley LYONS comes into our cell while we
 were sleeping scaring (ME & CORTEZ HOWARD) us
 awake, with questions about the situations listed
 about Dep JOURDEN & DEWITT. During conversation i jump
 off my (top) bunk to continue the conversation
 standing and for no reason, (LT. at the time) now
 Captian Bradley LYONS got startled because i
 jumped off my bed and well... He kinda in a way
 passed gas and ran out our room. And these incidents
 caused me to go to the dicipline restrictive UNIT (DRU)
 of the facility. A couple different times this also is
 where i met THERESA SIMMONS who for 5 months ^{July - Jan 24}
 tricked me into being her 'sexual slave' (as she put it)
 in exchange for sexual favors she told me i would be
 bonded out of Jail for \$175,000.00, she gave me
 small amounts of weed & cocaine also E-Cigarettes, Suboxone
 cellular phone, she would also pleasure me sexually through
 a hole (Food Slot) in my cell door. (refrence 1:22-cv-248
 JTN) and a couple dozen times SIMMONS asked me
 to Masterbate myself for her, also ask me to reach and
 through a hole in her pants play with her vagina

and smear my face with her vaginal juices, and many other strange requests. Such as inserting my finger into her anus (through a hole in her pants) and licking my finger, I am involving Kent county SHERIFFS OFFICE (ASSN) because the entire 5 months that I was raped I was sending 'kites' (prisoner/inmate to DEPUTY communication) about what was happening; But was ignored because of issues with Deputies, I was sending kite's on camera the entirety of my rape to no avail..

Because of family outreach Center Inc for employing unprofessional employees such as Roger Burk, Theresa Simmons & Carolyn, my schizophrenia is worse, my depression is worse, my PTSD is worse, my suicidal behaviors and thoughts are worse. Family Outreach Center Inc, stated on the News (News 8 also Fox 17) that the company would do whatever it takes to rectify this and \$1,100,000.00 from Family out reach alone would rectify the abuse i've endured from the behaviors of thier employees. Vital Core and Corizon health strategies also. I was told by THE HONORABLE AND BEAUTIFUL JANET T. NEFF to create a seperate action to my BONTIAM vs. SIMMONS case. And this is it! I have the right to be fully protected and these named people and entities made sure this isn't the case! I am extremely sad and depressed. This party also wishes to proceed forma pauperis. Thank You.

IV. Relief

State briefly and precisely what you want the court to do for you.

10 MILLION DOLLARS (10,000,000.00) FROM KENT COUNTY
SHERIFFS OFFICE, ASSN & et al.
3 MILLION DOLLARS (3,000,000.00) FROM KENT COUNTY
2 MILLION DOLLARS (2,000,000.00) BRADLEY LYONS

V. Notice to Plaintiff Regarding Consent

In accordance with the provisions of 28 U.S.C. § 636(c) and Federal Rule of Civil Procedure 73, you are hereby notified that the United States magistrate judges of this district court may, upon your consent, conduct any or all proceedings in this case, including a jury trial and entry of a final judgment. If you consent, any appeal from a judgment entered by a magistrate judge shall be taken directly to the United States Court of Appeals for this judicial circuit in the same manner as an appeal from any other judgment of a district court.

Magistrate judges have greater flexibility in their schedules than district judges, who have heavy criminal caseloads that take priority over civil trials. Accordingly, the magistrate judges are generally able to schedule prisoner civil rights cases for jury trial much sooner, and they are able to provide firm trial dates. Magistrate judges are experienced trial judges who handle a great number of prisoner civil rights cases.

Your decision to consent to the dispositive jurisdiction of a United States magistrate is entirely voluntary. If you do not consent to a magistrate judge, the case will be randomly assigned to a district judge. The magistrate judge already assigned to this case would continue to decide all pretrial matters and would handle all dispositive motions by report and recommendation.

Please check **ONE** box below to indicate whether you voluntarily consent to proceed with a United States magistrate judge or if you would instead prefer that the case be assigned to a district judge.

☐ I hereby voluntarily consent to the United States magistrate judge conducting all proceedings in this case, including entry of a final judgment and all post-judgment matters.

☒ I request that this case be assigned to a district judge.

9/11/2024
Date


Signature of Plaintiff BFE

NOTICE TO PLAINTIFF(S)

The failure of a *pro se* litigant to keep the court apprised of an address change may be considered cause for dismissal.

NAME: Kevin E. Bonham
KENT COUNTY CORRECTIONAL FACILITY
703 BALL AVENUE N.E.
GRAND RAPIDS, MI 49503

GRAND RAPIDS MI 493

27 SEP 2024 PM 1 L



Office of the Clerk
UNITED STATES DISTRICT COURT
399 FEDERAL BUILDING
110 MICHIGAN N.W.
GRAND RAPIDS, MI 49503

This mail originates
from the
Kent County Correctional Facility

49503-352210

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BFE